

United States District Court  
STATE AND DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA

V.

DEAN EARL WILKENS

## CRIMINAL COMPLAINT

Case Number:

12-MS-61(MKK)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

COUNT 1  
(Aggravated Sexual Abuse)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

DEAN EARL WILKENS

an Indian, did knowingly engage in a sexual act with Jane Doe, also an Indian and a child under the age of twelve years, to wit: contact between the mouth and the penis, the mouth and the vulva, and the mouth and the anus, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2241(c), 2246(2)(C), and 2246(2)(B).

COUNT 2  
(Aggravated Sexual Abuse)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

DEAN EARL WILKENS

an Indian, did knowingly engage in a sexual act with Jane Doe, also an Indian and a child under the age of twelve years, to wit: the penetration, however slight, of the anal and genital opening of Jane Doe by a hand and finger and by any object, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desires of the defendant, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2241(c), 2246(2)(B), and 2246(2)(C)

SCANNED

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U.S. DISTRICT COURT ST. PAUL

COUNT 3

(Aggravated Sexual Abuse)

Between on or about December 12, 2008 and December 12, 2011, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

DEAN EARL WILKENS

an Indian, did knowingly engage in a sexual act with Jane Doe, also an Indian and a child under the age of twelve years, to wit: contact between the penis and vulva, contact with the penis occurs upon penetration however slight, in violation of Title 18, United States Code, Sections 1151, 1153(a), 2241(a)(1), 2246(2)(A).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Feb. 23, 2012  
Date

The Honorable Mary Kay Klein  
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

C E B

Signature of Complainant  
Charles E. Bonser  
FBI

at

Bemidji, MN 56601  
City and State

Mary Kay Klein  
Signature of Judicial Officer

1 STATE OF MINNESOTA )

2 )

3 COUNTY OF BELTRAMI ) ss. AFFIDAVIT OF CHARLES EDWARD BONSER

4 )

5 )

6  
7 1. Your affiant, Charles Edward Bonser, being duly sworn,  
8 does depose and state as follows:

9 2. I am a Special Agent (SA) of the Federal Bureau of  
10 Investigation (FBI). I have been a Special Agent of  
11 the FBI since December 2010. I am currently assigned  
12 to the Bemidji, Minnesota Resident Agency of the FBI  
13 with the primary responsibility of investigating  
14 violent crimes that occur on the Red Lake Indian  
15 Reservation. The information contained in this  
16 affidavit is based on my knowledge and on the  
17 reporting and knowledge of other law enforcement  
18 officers involved in this investigation.

19 3. On December 12, 2011, the Federal Bureau of  
20 Investigation - Bemidji Resident Agency was informed  
21 of a sexual assault of a child that had occurred on  
22 the Red Lake Indian Reservation. The victim, Jane Dow  
23 #1, disclosed the abuse to a school official, who  
24 contacted law enforcement.

25 4. Jane Doe #1 was interviewed by the Family Advocacy  
26 Center of Northern Minnesota (FACNM) on December 13,  
27 2011. During the interview at FACNM, Jane Doe #1  
28 disclosed that her grandfather, Dean Wilkens, used his  
29 tongue, fingers, and penis, to touch her vagina. Jane  
30 Doe #1 also disclosed that Dean Wilkens inserted his  
31 tongue, fingers, and penis into her vagina. Jane Doe  
32 #1 disclosed that the abuse occurred in the Wilkens'

1 residence and that Dean Wilkens has sexually abused  
2 her on numerous occasions.

3 5. Jane Doe #1 has been living at the Wilkens' residence  
4 for the last four years.

5 6. I know that the Wilkens' residence is within the  
6 exterior boundaries of the Red Lake Indian  
7 Reservation.

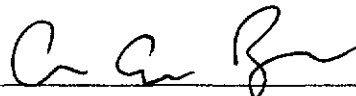
8 7. I know that Dean Earl Wilkens, date of birth  
9 XX/XX/1952, is an enrolled member of the Red Lake Band  
10 of Chippewa Indians.

11 8. I know that Jane Doe #1 is 11 years old and is  
12 eligible for enrollment in the Red Lake Band of  
13 Chippewa Indians.

14 9. I have not included every fact know to me concerning  
15 this investigation. I have set forth only the facts  
16 necessary to establish probable cause that a federal  
17 crime has been committed.

18 10. Based upon the above information, I believe that there  
19 is probable cause to conclude that on multiple  
20 occasions between an undetermined date in 2007 and  
21 December 9, 2011, within the exterior boundaries of  
22 the Red Lake Indian Reservation, Minnesota, a location  
23 within the special territorial jurisdiction of the  
24 United States, Dean Earl Wilkens, an Indian male, date  
25 of birth XX/XX/1952, did knowingly engage in sexual  
26 acts with another person, Jane Doe #1, also an Indian,  
27 date of birth XX/XX/2000, a person who has not  
28 attained the age of 12 years; in violation of Title  
29 18, United States Code, Sections 1151, 1153, and  
30 2241(c).

31 11. Further your affiant sayeth not.  
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4 

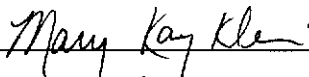
5 Charles Edward Bonser

6 Special Agent

7 Federal Bureau of Investigation

8 Bemidji, Minnesota

9  
10 Subscribed and sworn to before me this 23 day of February,  
11 2012.  
12  
13

14 

15 U.S. Magistrate Judge  
16